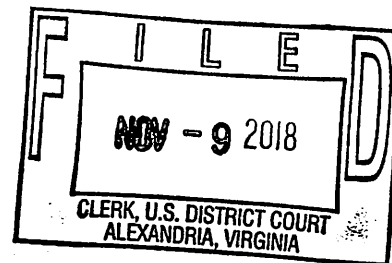


## UNITED STATES DISTRICT COURT

for the  
District of  
Eastern District of Virginia  
Division of  
Fairfax County Division



Susan E. Pattishall

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Vinton G. Cerf

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

18cv1396 LO/MSN  
(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☐ Yes ☒ No

## COMPLAINT FOR THE CONVERSION OF PROPERTY

(28 U.S.C. § 1332; Diversity of Citizenship)

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Susan E. Pattishall
Street Address	6 2nd St.
City and County	City of Crisfield Somerset County
State and Zip	Maryland 21817
Code Telephone	410 422-6709
Number	
E-mail Address	spattis@my.wgu.edu

**B. The Defendants****Defendant No. 1 Name**

Vinton G. Cerf

**Job or Title (if known)**

computer scientist (retired)

**Street Address**

1435 Woodhurst Blvd.

**City and County**

McLean Fairfax County Virginia 22102

**State and Zip Code****Telephone Number**

(424) 270-4474 (703) 448-0965 (703) 560-4004

**E-mail Address (if known)****Defendant No. 2 Name****Job or Title (if known)**

Robert E. Kahn

**Street Address**

computer scientist (retired)

**City and County**

909 Lynton Pl.

**State and Zip Code**

McLean Fairfax County

**Telephone Number**

Virginia 22102

**E-mail Address (if known)**

(314) 504-5543 (224) 766-0929 (703) 965-3590

**Defendant No. 3 Name****Job or Title (if known)****Street Address****City and County****State and Zip Code****Telephone Number****E-mail Address (if known)****Defendant No. 4 Name****Job or Title (if known)****Street Address City  
and County State and  
Zip Code Telephone  
Number****E-mail Address (if known)**

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Under 28 U.S.C. § 1332, federal courts may hear cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. In that kind of case, called a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff. Explain how these jurisdictional requirements have been met.

**A. The Plaintiff(s)****1. If the plaintiff is an individual**

The plaintiff, Susan E. Pattishall, is a citizen of the  
 (name)  
 State of (name) Maryland

**2. If the plaintiff is a corporation**

The plaintiff, (name) \_\_\_\_\_, is incorporated  
 under the laws of the State of (name) \_\_\_\_\_, and  
 has its principal place of business in the State of (name) \_\_\_\_\_

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**B. The Defendant(s)****Defendant number 1****1. If the defendant is an individual**

The defendant, Vinton G. Cerf, is a citizen of the  
 (name)  
 State of Virginia  
 (name)  
 Or is a citizen of (foreign nation) \_\_\_\_\_

**2 If the defendant is a corporation**

The defendant, (name) \_\_\_\_\_, is incorporated under  
 the laws of the State of (name) \_\_\_\_\_, and has its principal  
 place of business in the State of (name) \_\_\_\_\_  
 Or is incorporated under the laws of (foreign nation) \_\_\_\_\_,  
 and has its principal place of business in (name) \_\_\_\_\_

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

**Defendant number 2**

**1. If the defendant is an individual**

The defendant, Robert E. Kahn, is a citizen of the  
(name)  
State of Virginia  
(name)  
Or is a citizen of  
(foreign nation)

**2. If the defendant is a corporation**

The defendant, (name) \_\_\_\_\_, is incorporated under  
the laws of the State of (name) \_\_\_\_\_, and has its principal  
place of business in the State of (name) \_\_\_\_\_.  
Or is incorporated under the laws of (foreign nation) \_\_\_\_\_,  
and has its principal place of business in (name) \_\_\_\_\_.

**C. The Amount in Controversy**

I do not know how much to assess, as it would mirror money from the spies and hostile nations because the defendants were likely paid thousands. I think they received more than \$75,000.00 if they have sold for so long, or 38 years. The defendants have sold and/or would sell my written work to hostile foreign nations. The fact "time-barred" might be an issue should not be my copyright, which is a matter of honor. After the defendant told everyone he authored my work, he earned intellectual respect that was not his. "Timed-barred" should not mean he gets to become the author of my work simply because I have just discovered who Vinton G. Cerf and Robert Kahn are. I am under the impression they sold it to spies John Anthony Walker (Russia) and Jonathan Jay Pollard (Israel) in 1980, as well as to CERN of Switzerland, or Tim Berners-Lee for CERN, acronym for *Conseil Européen pour la Recherche Nucléaire*, or the European Organization for Nuclear Research. It is rumored Israel has a publication of this material. Lately, it has been rumored that he has sold to North Korea and China. Having been told so, what choice did I have but to report it? I have seen spin-offs of the theft circumstances in books by renowned author, Dan Brown, and in the creative producing of a Novus video about the galaxy. The value cannot be assessed because the defendant has been selling it for 38 years. When I found them. I wrote to DARPA but received no reply. I want the manuscript returned to me. The punitive damages value is up to the court considering its involvement in the defendants' sales to foreign governments and interested private parties. I am suggesting three to five million dollars be the value because they used my material to become noticed to intellectuals conned into thinking the robbers were more than they were. Jonathan Jay Pollard gave them money. The trouble with this is my information came from Anne Pollard when a Pollard feature ran in the Huffington Post quite recently. One essay brought them a peace prize.

**III. Statement of Claim****A. Describe the property that you own that is the subject of this complaint, including its value.**

The property is my theory of relativity manuscript and other essays. The defendants have been selling my work in whole or in parts for 38 years. I could not find the defendants. I did not know who they were. My work consists of a special philosophical theory of relativity and scientific explanations and philosophical theories about the Big Bang and the Missing Link. It is coupled with a voice of God theory I wrote, people, I am told, generally assume was authored by Vinton Cerf. I am the actual author of all this material. It was work begun for my future teaching. Sentimental and intellectual value motivated me to write philosophically about the galaxy, aerospace, physics theories, aircraft, and overlapping sciences, social sciences, and those lexicons. The compensation cannot be assessed because it has sentimental and secretive value. It is private work intended for a future in writing for science as a science writer at a teaching level. I say it reveals information that would spy on my brother who was an aerospace engineer at the time. He was the director of the Goddard satellite program. I think it is what they hoped when they stole it, but it is my work that has an emotionally intelligent knowledge of exploring sidereal space and other topics. This coveted value may have helped them help US enemies to spy on him. I cannot assess this value, but it appears it is certainly worth a lot of money to the thieves who stole it. Even if this value cannot be proved, the work is mine not Vinton Cerf's or Robert Kahn's. Robbing me was too much helping themselves to my work.

It can be assumed the defendants have amassed much more than \$75,000.00, I am seeking the return of the written material and equitable damages, with the return of the writings foremost. They stole these writings and sell a document that is my theory of relativity. It appears they sell it to other entrepreneurs as a 'philosophers stone's' (my magnum opus). Specifically, I am offended they involved my work in treason when the sales are to hostile foreign countries. It could be the 'USN' reconnaissance document mentioned in the Walker spy case that's contents were not revealed. The defendants sold US documents to Russia and Israel, respectively. Cerf mentioned my work in regard to Walker, saying he had a copy. It sounds like Cerf and Kahn were receiving money for stolen documents and they worked for the Defense Advanced Research Projects Agency (DARPA). Not to accept equitable damages representing 'spy gotten money', I mean for the loss of college work and emotional anguish causing loss of the intended career, as the material was serious loss and it was by over three years work in college. It was material that would make anyone more effective. For this and the rude and sexist discrimination I

have endured, I am asking three to five million dollars be the value. Whatever the court decides, the return of the manuscript and sentimental value is more valuable to me than money. For thirty-eight years, my writing and copyright made the defendants more effective professionally than they could have been on their own. I believe they operate as a tyranny and I believe the world should know about this.

**B. How and when did you come to own the property?**

I wrote it. I wrote the material over the previous three college years and condensed it that fall, 1980. I was taking an astronomy course, while living in Norfolk. It is my work, which consists of a special philosophical theory of relativity and scientific formulas along with my philosophical theories about the Big Bang, the Missing Link, a voice of God from space theory, exegesis, and more. As well there are other personal essays. By the grapevine, people generally assume Vinton Cerf authored the voice of God theory, though I am the actual author of this material. I was in college at Old Dominion University, but the work is continued from work done at previous colleges. Some was typed, but a lot of it was in my handwriting.

**C. How and when did the defendant(s) obtain possession of the property? Describe with particularity the actions the defendant(s) took to convert the property.**

Together, Vinton Gray Cerf and Robert Edward Kahn set up the offer to me of a ride home, to intentionally steal a valuable collection of writings authored by me, a 'philosopher's stone' (my magnum opus) theory of relativity, personal stories about experiences and family, and a college assignment on the elliptic orbit. Vinton Cerf was the main thief who stole what is my theory of relativity manuscript with the assistance of Robert Kahn and a barperson named Natalie from a Norfolk, VA pizza bar on Ocean View Avenue. It was on the pretense of a ride home because it was raining in late September or early October 1980. Vinton Cerf was the thief, a driver who faked car trouble and told me to wait in the bar. Then he intentionally drove off, or stole, my partly typed and partly handwritten manuscript, an utterly scientific, war embroiled collection of essays.

In the car, despite he didn't want to say much, he turned to me and said, "Give me a kiss," without a hint of passion.

I said, "What! I'm not even home yet."

He insisted I kiss him, so I did, but then he couldn't start the car. My collection of work was in a large, padded return envelope addressed to Vantage Press. This was resting on the dashboard, where I had placed it to give him a kiss.

"Go into the bar, so I can get the car started," he said.

"I'm okay with that. I don't have to go into the bar," I said.

"No, wait in the bar," he insisted. Then he mumbled, "and I will come around."

Thinking it was a real start the car, like it would be a lot of trouble or a need to raise the hood to work, I got out of the car without taking my envelope, no thanks to it was raining. When too much time went by in the bar, I started looking around outside. Suddenly, I was distraught with realizing what had happened. I went back into the bar to ask the barperson who the guy was. She said she didn't know him. "What?!" I exclaimed. I realized I had been set up, but she brought me a cup of coffee. That coffee seemed to have arrived awfully fast. It was so sickening that thief person took my theory of relativity and he did not even go to my university, not even to one in Virginia. At first, anything helpful said in the car had simply flown out of my mind as soon as I realized I'd been tricked and was emotionally distraught.

Next, lo and behold, like a 'gallant knight', who should appear along with the cup of coffee but the other guy on the TCP/IP Wikipedia page, Robert E. Kahn. Robert Kahn was the accomplice who sat down at my table. He sat down opposite me and asked me what was wrong. I told him what Vinton Cerf's 'ride home' had done to me. He was sympathetic. He offered to really take me home and I had to accept. On the way home, I told him how much the lost writing meant to me and asked him to help me get it back, but Robert Kahn claimed not to know Vinton Cerf.

I became disillusioned and neither remembered nor recognized their names until I saw their photos together on Wikipedia quite recently. I am used to hearing, lately, about a 'Voice of God' book or lecture by Vinton Cerf. My material has the voice of God description he adapted or is using. People have

said to me they have accused him to his face and received "F" for their work as a result. The fact Vinton G. Cerf stole my manuscript, means they thought it was valuable to make money. They involved my manuscript in treason. Anne Pollard said Robert Kahn gave her my manuscript along with other documents. She returned mine saying I would need it back, but Vinton Cerf kept it and sells it.

**D. (If the defendant(s) rightfully came into possession of the property):** Describe how and when you notified the defendant(s) that the property belonged to you. Describe how and when you demanded that the defendant(s) deliver or return the property, and what response you received from the defendant(s). Attach a copy of any written correspondence with the defendant(s), if such copies exist.

1. The defendants never rightfully owned possession of my writing because they stole it. I mailed the defendant Vinton Cerf a letter dated October 11, 2018. It is attached.
2. I wrote to DARPA on May 21, 2018. I asked Director Steven Walker to "respond promptly with the solution favorable to all parties". It is attached.
3. I telephoned Robert Kahn in June 24, 2018. He said he did not remember me.

#### IV. Relief

**State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.**

Even though Vinton Cerf and Robert Kahn are credited with so much computer history, they took pleasure in ruining my first years of college education in philosophy, a valuable time and material I wrote for me to research and teach with. The mental anguish caused me to have to start all over again in college and I do not believe Vinton Cerf should be credited for what I did and authored. It was a philosophical theory of relativity for my future use as a teacher and to publish one day. There were other essays and stories. I am asking for this manuscript to be returned so I can continue working where I can. The Cold War continued by my material being what they wanted to sell to Israeli spies. I believe my work was sold to the Pollards by them, but when it was known to have been mine to those buyers it was returned. This is unknown to the public. Vinton Cerf kept it and 'mentioned' this activity 09/07/2018, when my clairaudience by him said, 'yes, Walker had a copy' (too). I know my material was unique and it helped them. It would help anyone. It increases layperson comprehension of physics, the Big Bang, and the Missing Link, among topics. It was related to achievement and I had hope for it to win a prize.

People in the US Navy knew me and that I was writing about space and other topics. The work is likely the document that's contents were not revealed in the Pollard and Walker spy cases. That news was not yet public. It is lately I am understanding things this way. Source Anne Pollard's communication of the clairaudient nature volunteered the information recently when The Huffington Post ran a feature about the Pollards. Along with her info was Vinton Cerf confirmed Walker had a copy. I wish I could subpoena the Pollards, but it would be a lot simpler if Mr. Cerf would just return my material.

The defendants said it acted outshining them; there should not be a woman appearing smarter than they were; and that they'd wanted the 'place' I was in. I was taking a paid for course and my brother is Robert A. Pattishall, Sr. (1946 - 2016), an aerospace engineer and satellite expert who was my brother, not theirs, if that's what place they thought I was in they could take. I was interested in astronomy and aerospace by my own steam. Director Steven H. Walker, current director of DARPA (Defense Advanced Research Projects Agency), did not respond when I wrote a letter to him, dated May 21, 2018, and told him Cerf and Kahn had stolen a manuscript from me. I cannot help it if I know Cerf and Kahn took the credit, awards, medals, for being computer smart by themselves and philosophically brilliant by me. There was no reason they couldn't have just offered DARPA their own computer science stuff, but to be more effective, they stole my work in philosophy and social sciences. In so doing, they destroyed my first years of education and my emotional health.

I must ask the court to think in terms of the money they have made selling my oeuvre, a

collection of scientific theories and personal reflections, around the world. The anguish this has caused me was painful because I could not say I achieved what I had in fact accomplished, which was a unique theory of relativity on linking technologies with lexicon and explaining this. I could not go to family reunions. The accomplishment was lost, though it was ours—or mine, in this case. By rights, all the money they made selling my manuscript to foreign governments and writers should be mine, although I am not a spy and I would not sell it to a foreign country. That would be treason.

The sentimental value cannot be measured. I think the document itself is worth two million dollars (2M), considering it is used as a philosopher's stone it is by all the countries and people to whom they have sold it. If this is not realistic to the court, please decide a compensation for me. I would never sell this document to a spy or, secretly, to a foreign country. If I wouldn't make that kind of money with it, I am just saying I am aware of the exorbitant amount of money spies trade for documents and they are offensive selling my work while I live in poverty. They have been making money by it for 38 years.

The sexist trick was downright disturbing. This and their slander and discrimination of my sex as an intelligent aerospace science writer/author should be compensated. The offensive slander and discrimination of my female sex as a reason for stealing the work should be compensated. The aggravation wastes my time and prevents my social life. If I was compensated, it should compare to other sex discrimination. I do believe the punitive damages should at least be something.

For example, I am very aware my research opportunities were stolen away and sold to a myriad of customers. There was no gratitude for my help in areas where I might have done something more knowledgeable than they could. Others using it did not author what they used. It was not Vinton Cerf's, Robert Kahn's, Jonathan Pollard's, or John Anthony Walker's to sell, so not their help to whatever country and whomever they sold it to. I once thought only I could know how to read it. The essays were helped by bible verses and biblical exegesis. I had no copy of the manuscript. I threw away what was left after the condensing, and it was written during the uprising in Iran. Compensation for stolen opportunity should be worth at least my current bill with the Department of Education, \$115,000.00 plus interest by the time I graduate Ph.D. in Communication or Occupational Technology. My opportunity was not just loss of opportunity for me to thrive. It was used by someone else or many others. I do not know what to assess this, so I assessed this at \$880,000.00 and \$120,000.00. (1M)

The stolen away opportunity to help others was always painful. It was not used in the same ways as I would research and practice. Cancer research suffered, if I may say what I was going to research among my projects. My brother in aerospace died of cancer in 2016. I loved and admired him a lot. In 1980, aerospace was beginning for me. I started college later than average. The manuscript I was writing improved comprehension for laypersons reading in its lexicons. All the thieves and spies did was cause my theory of relativity to help research on nuclear weaponry and biological warfare and fiction writers. If my manuscript is returned to me, I could take my real research back to somewhere worthwhile.

I survive month to month on SSI and I pay house taxes. I don't like SSI while these men rave on at and about me in their jeering manner, congratulating themselves for the wrong-doing to me by their theft. They pretend they are worth being arrogant to me because they are rich, and I am poor. I am the manuscript's author. Why should they be credited for it—or for the theft of it? I am now disabled with spinal cord injury. I need to live in a city near conveniences and places to go. I don't like hearing the thieves brag about their wealth because of Stealing it and selling it, and the rich authors create the spin-offs. Compensation would pay for me to live with domestic help in or near a city. It also would help me for them and their clairaudent speaking to me to go someplace else to laugh about being so corrupt. I had to understand Tim Berners-Lee did not have to worry he knew the stolen manuscript they were exploiting, because they told him, in 1980, that I was dead and could not bother him. People taking the credit for my writing likely want me dead. Three to five million dollars (3- 5M) is understandable for use of the work; possible distribution of the work; awarding prizes for the essay on peace; the theft itself; involving the work in treason; and the discrimination and slander.

What is the compensation for a personal and scientific oeuvre being involved, unbeknown, in a journey by Vinton Cerf and Robert Kahn treason? I do not know whether a stolen manuscript's unwilling involvement in treason can warrant exemplary damages, but, to me, yes, it can. George W. Bush awarded them a peace prize. Was it for robbing me? They didn't author my stories of peace. A robbed author who is an unwitting and unwilling participant in giving a hostile foreign nation material should get something.

The court should order injunctive relief for the sake of our country's scientific excellence and



homeland security. The injunction would be that neither Cerf nor Kahn can sell my manuscript to anyone ever again. Tim Berners-Lee and CERN should not sell or share the manuscript, as well. Anyone who has the manuscript in their possession should refrain from selling it. It is true monetary damages later would not compensate me for the injury or injuries I sustained, and I am sustaining because of the events described above. Now I am a Ph.D. candidate and a professional researcher/teacher, their slander needs to stop. I need my actual character to be acknowledged and cleared of their hate crime.

Totaled, is \$5,000,000.00 in punitive damages. I think they have a lot more money than they report to the IRS. M\*y manuscript's value should not help them while I need money. I am open to the court decides what the punitive damages would be should this assessment be too much or too small.

The sentimental value of the manuscript will hurt very much if it is not recovered. I want the manuscript Vinton Cerf and Robert Kahn stole returned to me above any monetary award. I want all the personal stories, scientific formulas and theories, and crossover lexicon essays returned with nothing left out. I could not file this sooner because I just recently discovered where to find the two people that stole my work. They worked for DARPA. I recognized them on Wikipedia after I had to look close at Vinton Cerf without long hair. I am sure that he is the same man with Robert Kahn in 1980.

#### IV. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

##### A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: \_\_\_\_\_

Signature of Plaintiff \_\_\_\_\_

Printed Name of Plaintiff \_\_\_\_\_

11-7-18

Susan E. Pattishall

##### B. For Attorneys

Date of signing: \_\_\_\_\_

Signature of Attorney \_\_\_\_\_

Printed Name of Attorney \_\_\_\_\_

Bar Number \_\_\_\_\_

Name of Law Firm \_\_\_\_\_

Street Address \_\_\_\_\_

State and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-mail Address \_\_\_\_\_